

Electronically Filed On: July 11, 2019

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General Bankruptcy Counsel for Lenard Schwartz, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

SIX STAR CLEANING AND CARPET
SERVICES, Inc.,

Debtor.

Case No. BK-S-13-18735-MKN
Chapter 7

**DECLARATION OF YVETTE
CHEVALIER, ESQ. IN SUPPORT OF EX
PARTE APPLICATION TO EMPLOY
FLANGAS LAW FIRM, LTD. AS
SPECIAL LITIGATION COUNSEL FOR
LENARD E. SCHWARTZER, CHAPTER
7 TRUSTEE, PURSUANT TO 11 U.S.C. §§
327(e) AND 328(a) AND FEDERAL RULE
OF BANKRUPTCY PROCEDURE 2014**

Date of Hearing: N/A

Time of Hearing: N/A

Judge: Honorable Mike K. Nakagawa

I, Yvette Chevalier, Esq., hereby declare as follows:

1. I am over the age of 18 and mentally competent. Except where stated on information and belief, I have personal knowledge of the facts in this matter and if called upon to testify, could and would do so. I make this declaration to support the *Ex Parte Application to Employ Law Office of Flangas Law Firm, Ltd. As Special Litigation Counsel for Lenard Schwartz, Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 327(e) and 328(a) and Federal Rule of Bankruptcy Procedure 2014* (the "Application").¹

...

¹ Unless otherwise set forth herein, all defined terms shall have the same meaning ascribed to them in the Application.

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1 2. I am an attorney licensed to practice law in the State of Nevada. I am the principal
2 of Employ Law Offices of Yvette Chevalier, Esq., PLLC (the "Chevalier Firm").

3 3. On October 15, 2018, the Court entered an *Order Granting Ex Parte Application*
4 *to Employ Law Office of Yvette Chevalier, PLLC As Special Litigation Counsel for Lenard E.*
5 *Schwartzter, Chapter 7 Trustee, Pursuant to 11 U.S.C. §§ 327(e) and 328(a) and Federal Rule of*
6 *Bankruptcy Procedure 2014* [ECF No. 268]².

7 4. I believe that it is in the best interests of creditors for the Trustee to employ the
8 Flangas Firm to serve as my co-counsel in the District Court Action and any related arbitration.

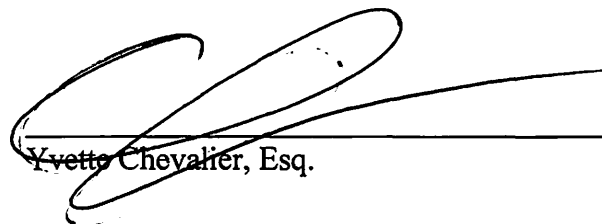
9 5. I understand that the employment of the Flangas Firm will modify the terms of my
10 employment by the Debtor's bankruptcy estate as set forth herein and in the Application.

11 6. The employment of the Flangas Firm will result in the contingency fee paid by the
12 Debtor's bankruptcy estate increasing from thirty percent (30%) to forty percent (40%), which is
13 a common contingency fee charged by law firms in similar litigations.

14 7. The Contingency Fee paid by the Debtor's bankruptcy estate shall be divided as
15 follows: (a) the Firm shall be entitled to thirty percent (30%) of the gross amount recovered from
16 the District Court Action; and (b) the Chevalier Firm shall be entitled to ten percent (10%) of the
17 gross amount recovered from the District Court Action.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct.

20 Dated this 19th day of June, 2019.

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22 
23 Yvette Chevalier, Esq.
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28 ² All references to "ECF No." are to the numbers assigned to the documents filed in the above-captioned bankruptcy case as they appear on the docket maintained by the clerk of the court.